

<b>CROMERR System Checklist Template</b>	
<b>Item</b>	
<b>Registration (e-signature cases only)</b>	
<b>1. Identity-proofing of registrant</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>1a. (priority reports only) Identity-proofing <i>before</i> accepting e-signatures</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>1b. (priority reports only) Identity-proofing method (See 1bi, 1bii, and 1b-alt)</b>	
<b>1bi. (priority reports only) Verification by attestation of disinterested individuals</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>1bii. (priority reports only) Information or objects of independent origin</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>1b-alt. (priority reports only) Subscriber agreement alternative</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>2. Determination of registrant's signing authority</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>3. Issuance (or registration) of a signing credential in a way that protects it from compromise</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>4. Electronic signature agreement</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):.</b>

<b>CROMERR System Checklist</b>	
<b>Signature Process (e-signature cases only)</b>	
<b>5. Binding of signatures to document content</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>6. Opportunity to review document content</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>7. Opportunity to review certification statements and warnings</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>Submission Process</b>	
<b>8. Transmission error checking and documentation</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>9. Opportunity to review copy of record (See 9a through 9c)</b>	
<b>9a. Notification that copy of record is available</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>9b. Creation of copy of record in a human-readable format</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>9c. Providing the copy of record</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>10. Procedures to address submitter/signatory repudiation of a copy of record</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>11. Procedures to flag accidental submissions</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>12. (e-signature cases only) Automatic acknowledgment of submission</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>Signature Validation (e-signature cases only)</b>	
<b>13. Credential validation (See 13a through 13c)</b>	
<b>13a. Determination that credential is authentic</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>13b. Determination of credential ownership</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>



<b>CROMERR System Checklist</b>	
<b>13c. Determination that credential is not compromised</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>14. Signatory authorization</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>15. Procedures to flag spurious credential use</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>16. Procedures to revoke/reject compromised credentials</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>17. Confirmation of signature binding to document content</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>Copy of Record</b>	
<b>18. Creation of copy of record (See 18a through 18e)</b>	
<b>18a. True and correct copy of document received</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>18b. Inclusion of electronic signatures</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>18c. Inclusion of date and time of receipt</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>18d. Inclusion of other information necessary to record meaning of document</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>18e. Ability to be viewed in human-readable format</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>
<b>19. Timely availability of copy of record as needed</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>

<b>CROMERR System Checklist</b>	
<b>20. Maintenance of copy of record</b>	
	<b>Business Practices:</b>
	<b>System Functions:</b>
	<b>Supporting Documentation (list attachments):</b>